

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT STOUD,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	
	:	
SUSQUEHANNA COUNTY,	:	NO. 3:17-CV-2183-MEM
	:	
Defendant	:	

MOTION IN LIMINE OF DEFENDANTS TO PRECLUDE PLAINTIFF'S
INTRODUCTION OF ANY ATTORNEY-CLIENT PRIVILEGED MATERIAL
OR TESTIMONY

Defendant, Susquehanna County, through its attorneys, Kreder Brooks
Hailstone LLP, hereby makes the following Motion in Limine:

1. Plaintiff should be precluded from introducing any evidence protected by Attorney-client privilege.
2. This includes any advice or counsel, in any way received, from the former County Solicitor Michael Giangrieco or any defense counsel for the County, former or present.

3. The former Solicitor of Susquehanna County has recently filed a action in federal court against Susquehanna County.
4. The Complaint makes allegations which include advice provided by Mr. Giangrieco while he was acting as Solicitor to the County.
5. It is believed that Plaintiff will attempt to introduce statements made by the former Solicitor to the Susquehanna County Commissioners or other Susquehanna County employees which are privileged.
6. Plaintiff should be prohibited from introducing any evidence protected by Attorney-client privilege.

WHEREFORE, Defendant, Susquehanna County, respectfully request the Court to issue an Order precluding Plaintiff from introducing any evidence protected by Attorney-client privilege.

Respectfully submitted,

KREDER BROOKS HAILSTONE LLP

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(570) 346-7922

By /s/ A. James Hailstone
A. James Hailstone
Attorney I.D. #80055

CERTIFICATE OF SERVICE

AND NOW, this 21st day of August, 2020, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Motion in Limine with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

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ATTORNEYS FOR PLAINTIFF

/s/ A. James Hailstone

A. James Hailstone

Attorney I.D. #80055

Attorneys for Defendant